

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

THE DRAGONWOOD CONSERVANCY, INC.,
PLEGUAR CORPORATION,
TERRY CULLEN,

Plaintiffs,

v.

Case No. 16-CV-00534

PAUL FELICIAN,
PHIL SIMMERT II,
JANE AND JOHN DOE(S)
CITY OF MILWAUKEE, and
ABC INSURANCE COMPANY,

Defendants.

**DECLARATION OF HEATHER HOUGH IN SUPPORT OF
MOTION TO ADJOURN TRIAL**

I, Heather Hough, being first duly sworn, swear and state as follows:

1. I am an attorney, licensed to practice law in the State of Wisconsin, employed as an Assistant City Attorney for the City of Milwaukee.

2. Assistant City Attorney Jenny Yuan and I were assigned to represent the interests of the City of Milwaukee, Paul Felician and Phil Simmertt, II in the above-captioned case on or about November 15, 2019.

3. Attached and incorporated as Exhibit A is a true and correct copy of e-mails exchanged between parties regarding scheduling matters Thursday, November 21, 2019 through December 4, 2019.

4. Attached and incorporated as Exhibit B is a true and correct copy of the Mayor of Milwaukee's proclamation dated March 15, 2020 declaring a state of emergency in the City of

Milwaukee.

5. Attached and incorporated as Exhibit C is a true and correct copy of the Eastern District of Wisconsin's General Order issued March 16, 2020.

6. Attached and incorporated as Exhibit D is a true and correct copy of e-mail Plaintiffs received declaring the City of Milwaukee City Attorney's Office closed effective March 17, 2020.

7. Attached and incorporated as Exhibit E is a true and correct copy of the Eastern District of Wisconsin's General Order issued July 1, 2020.

8. Attached and incorporated as Exhibit F is a true and correct copy of e-mail chain between parties dated July 1, 2020. Defendants have been making a good faith effort to complete discovery in anticipation of the September 28, 2020 trial date.

9. Attached and incorporated as Exhibit G is a true and correct copy of e-mail chain between parties related to scheduling depositions dated July 14, 2020.

I declare under penalty of perjury that the foregoing nine (9) paragraphs are true and correct.

Dated and signed at Milwaukee, Wisconsin on July 15, 2020.

TEARMAN SPENCER
City Attorney

s/Heather Hecimovich Hough
HEATHER HECIMOVICH HOUGH
Assistant City Attorney
State Bar No.1092637
JENNY YUAN
State Bar No. 1060098
Assistant City Attorney
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City of Milwaukee, Paul Felician, Phil Simmert

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